

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Ruth Apple,

Plaintiffs,

v.

CSAA General Insurance Company dba AAA
Insurance; CSAA Insurance Exchange dba AAA
Insurance; and Maribel Leyva; DOES 1 – 20,
inclusive,

Defendants.

Civil Action No. 1:20-mc-91621

Pending in the District of Nevada,
Case No. 2:19-cv-01093-RFB-DJA

**NON-PARTY DANE STREET, LLC'S EMERGENCY MOTION
TO QUASH DEPOSITION SUBPOENA**

Non-Party Dane Street, LLC (the “Company or “Dane Street”), hereby moves pursuant to Fed. R. Civ. P. 45(d)(3), to quash a deposition subpoena served on it by Plaintiff Ruth Apple on November 9, 2020 and which commands Dane Street to produce one or more witnesses pursuant Fed. R. Civ. P. 30(b)(6) to testify regarding a total of 38 topics. The deposition is scheduled for November 17, 2020 at 9:00 a.m. PST / 12:00 p.m. EST. Plaintiff’s subpoena fails to provide Dane Street with a reasonable amount of time to comply given the numerous and breadth of the topics. Further, Plaintiff’s subpoena would impose an undue burden on Dane Street because Plaintiff is seeking discovery that exceeds the scope of what the District of Nevada has permitted in the case, and the information sought can be more easily obtained from some other source that is more convenient, less burdensome, or less expensive—namely, the Defendants. In addition, the subpoena must be quashed because it seeks irrelevant and duplicative information, and “disclosure [of] an unretained expert’s opinion or information that does not describe specific occurrences in dispute and results from the expert’s study that was not requested by a party.” Fed. R. Civ. P. 45(d)(3)(B)(ii). As a result, Dane Street respectfully request that the subpoena be quashed.

CERTIFICATE PURSUANT TO LOCAL RULE 7.1(a)(2) AND 37.1

Dane Street, LLC hereby certifies that on October 12, 2020 and November 6, 2020, one of their counsel, Joshua Sliker, conferred with Counsel for Plaintiff, in an effort to resolve or narrow the issues in dispute, but was unable to resolve or narrow the issues in dispute.

Respectfully submitted,

DANE STREET, LLC

By their attorney,

/s/ Matthew C. Chambers

Matthew C. Chambers (BBO No. 703285)

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CERTIFICATE OF SERVICE

This hereby certifies that on this 16th day of November 2020, this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants, including Counsel for Plaintiff and Defendants in this matter, via electronic and first-class mail:

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/s/ Matthew C. Chambers
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